

Holly Arrigoni/R5/USEPA/US

11/05/2007 09:00 AM To

"Bob Mosher" <Bob.Mosher@illinois.gov>

cc

David Pfeifer/R5/USEPA/US@EPA, Edward Hammer/R5/USEPA/US@EPA

bcc

Subject

Re: Receipt of the proposed site-specific modification of Illinois' boron standard applicable to the City of Galva

Bob,

After thorough review of the draft proposal for site-specific regulations applicable to the City of Galva, we have determined that the draft proposal is unapprovable by U.S. EPA as a site-specific criterion. A site-specific criterion is intended to protect a specific designated use, and a designated use can only be changed if it is not an existing use. Rather than describing how aquatic life will be protected, the current proposal cites technical and economic reasons for requesting the standards change, something that is more appropriately addressed through a water quality standards variance. If the issue is that the cost of compliance will cause widespread and substantial social and economic hardship, we recommend the City of Galva resubmit their petition as a water quality standards variance. While EPA cannot guarantee its approval, the data provided by Galva are more consistent with this approach. Please do not hesitate to contact either Dave Pfeifer or me if you would like further clarification.

Holly

Holly Arrigoni

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"Bob Mosher" <Bob.Mosher@illinois.gov>

10/16/2007 01:08 PM

To

Holly Arrigoni/R5/USEPA/US@EPA

cc

Subject

Re: Receipt of the proposed site-specific modification of Illinois' boron standard applicable to the Cit

Thanks. Keep in mind that this is a draft petition and we will be influencing Galva to change the proposed relief to specify which segments of the receiving streams will have what site-specific standards. What I need from the Region right now is a general indication of whether boron standards of 3.0 mg/L would be approvable for these small streams. The exact details will be worked out in the next couple of months.

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>>> <Arrigoni.Holly@epamail.epa.gov> 10/16/2007 12:12 PM >>>

Hi Bob,

Thank you for submitting the Proposed Site-Specific Water Pollution Regulations Applicable to the City of Galva for U.S. EPA's review. I have been assigned as lead reviewer of the draft document. I will share the document with NPDES and wetlands for their review as well and am asking for their comments by October 30th, with consolidated comments delivered to IEPA by November 6th. If you have any comments or concerns between now and then, please do not hesitate to contact me. Thank you.

Holly

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